

- F. Number of records reviewed: 21 (> 15%)      # (%)
- G. Quality of disclosure\* (\*also see discussion under Section VIII below):  
Excellent     ; Good x with the exception of 1 major flaw regarding whether the units were actually  
"lead-safe" as claimed by Brady Sullivan on all of the completed lead disclosure forms (DFs); Fair     ;  
Poor     ; Variable

V. **RRP Rule Inspection:** N/A (EPA Region 1 conducted an RRP compliance inspection separately on May 12, 2015)

VI. **Compliance Assistance**

What compliance assistance was provided? The inspectors explained the requirements of EPA's Lead Disclosure Rule in great detail and provided a copy of EPA-Region 1's Compliance Assistance package.

VII. **1018 Records Review:**

A. How many leases did inspector review? 21 (several leases are for the same units with different or the same tenants).

Issues with DFs: Brady Sullivan made a statement pertaining to the presence of lead-based paint and/or lead hazards on each DF. The following statement was found on all the current tenants' DFs:

"Known LBP....." was checked in all DFs. However, a statement was found on all DFs: "The Mill Building containing the unit was built before 1978 and as such, the apartment unit and common areas, stairways, and hallways are not entirely lead-free. Appropriate measures have been taken, however, to make the common areas and the apartment unit "lead-safe" in accordance with local, state, and federal regulations, including those of the US EPA. In the event....."

During the inspection, Marc Pinard provided the inspectors a copy of one lead paint related document for Mill West. The conclusions state that the main building of the Mill West property are "90% lead free." This is found in the report titled: "Phase I Environmental Site Assessment," by Les A. Cartier and Associates, dated September 2, 2010 (see Attachment 8: Les A. Cartier report, dated September 2, 2010).

Brady Sullivan recently removed the sentence about "lead-safe" from their current DF and submitted a copy of the new DF to the EPA inspectors. Mr. Pinard provided the EPA inspectors with a copy of a recent lead-related document, which is now listed on the new DFs. The report is new and is a result of lead dust testing that occurred within some residential units at around the time of the EPA's most recent RRP inspection on May 12, 2015. The lead dust testing results some show many positive results for lead dust within the Mill West property units and common areas.

Other lead dust testing did occur recently and the results were the basis for EPA issuing an emergency clean-up order (see Attachment 9: Copy of newly worded, blank DF for Mill West). The inspectors explained to Marc Pinard that for proper disclosures in the future, copies of all records pertaining to lead- both from the past and now more recent ones, must be given to all prospective tenants before they sign a lease and/or upon renewal of existing leases for all others.

During the EPA's follow-up investigation after the inspection, Inspector Magoon found that there are no lead records to back up the statement that the units are "lead-safe" in all DFs. To the contrary, the presence of lead-based paint and lead dust hazards in 88 out of 98 target housing units has been documented by several different lead inspections that occurred recently and which are still ongoing at the Mill West property (see Attachment 10: Copy of Copy of Les A. Cartier and Associates report: "Plan for Lead Dust Wipe Analysis / Lead Dust Hazard Mitigation" prepared by American Environmental Testing Services of New England, LLC (AETS): 195 McGregor St, Manchester NH, dated August 11, 2015 (see Plan 2 of 3, Section 5.1, Page 5).

**B. Table: Summary of Leases and Disclosure Forms ("DFs") Collected**

Unit # at 195 McGregor Street	Child(ren) Present (#/Ages)	Date Lease Signed	DF Date	Notes
306	none	2/22/15	2/22/15	
311	none	6/1/14; 4/29/15	6/1/14; 4/29/15	Same tenants/2 different leases
316	none	1/22/14; 1/9/15	1/22/14; 1/9/15	Same tenants/2 different leases; 2 <sup>nd</sup> DF: Management signed lease & DF 1 day after lessee (1/10/15)
322	none	2/26/15	2/26/15	
328	none	3/23/14; 2/19/15	3/23/14; 2/19/15	Same tenants/2 different leases; 2 <sup>nd</sup> DF: Management signed lease & DF 1 day after lessee (2/20/15)
331	1 minor, under 6 yrs. old	8/3/14	8/3/14	
333	none	4/3/15	4/3/15	
338	none	1/11/14; LD 2/1/15	1/11/14; 1/4/15	Same tenants/2 different leases
341	none	12/24/14	12/24/14	
404	none	9/3/14; 2/21/15	9/3/14; 2/21/15	Same tenants/2 different leases
409	none	5/15/15	5/15/15	
417	3, ages unknown	4/6/14; 3/30/15	4/6/14; 3/30/15	Same tenants/2 different leases; 2 <sup>nd</sup> DF: Management signed lease & DF 1 day after lessee (3/31/15)
427	none	2/13/15	2/13/15	
438	none	12/27/14; 1/18/14	12/27/14; 1/18/14	Same tenants/2 different leases

**List of Attachments**

1. Copy of EPA's Correspondence to Marc Pinard of Brady Sullivan, dated March 5, 2014;
2. Copy of signed Notice of 1018 Inspection Form, dated June 3, 2015;
3. Copy of TSCA Confidentiality Form, pending receipt from Marc Pinard of Brady Sullivan;
4. Copy of Receipt for Documents Form, dated June 3, 2015;
5. List of Brady Sullivan target housing properties provided by Marc Pinard;
6. Copies of Leases (21);
7. Copies of corresponding DFs (21);
8. Copy of newly worded, blank DF for Mill West;
9. Copy of Phase I Environmental Site Assessment report of Mill West, by Les A. Cartier and Associates, dated September 2, 2010; and
10. Copy of Les A. Cartier and Associates report: "Plan for Lead Dust Wipe Analysis / Lead Dust Hazard Mitigation" prepared by American Environmental Testing Services of New England, LLC (AETS): 195 McGregor St, Manchester NH (see Plan 2 of 3, Section 5.1, Page 5), dated August 11, 2015.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND  
5 POST OFFICE SQUARE, BOSTON, MA 02109-3912

MEMORANDUM

DATE: November 16, 2015

SUBJ: Inspection Report: TSCA Section 402c ("RRP Rule") Compliance Inspection of:  
Brady Sullivan Properties, LLC at the "Lofts at Mill West" or "Mill West,"  
Located at 195 McGregor Street, Manchester, New Hampshire

FROM: Molly Magoon, Environmental Protection Specialist/ Enforcement Officer *M. Magoon*  
Alma Padilla, Senior Environmental Employee (EPA Grantee)/ Inspector *Alma Padilla*  
EPA Region 1, Office of Environmental Stewardship (OES), Toxics and Pesticides Unit (TPU)

THRU: Sharon Hayes, Manager, TPU, OES *SH*

TO: File

I. General Information

- A. Firm and Address:  
Brady Sullivan Properties, LLC (hereinafter "Brady Sullivan")  
670 N. Commercial Street, Suite 303  
Manchester, NH 03101
- B. Location of Inspection:  
Lofts at Mill West (hereinafter "Mill West")  
195 McGregor Street  
Manchester, NH 03101
- B. Date of Inspection:  
5/12/15
- C. Personnel Participating in Inspection (name, title, affiliation):  
Molly Magoon, EPA Enforcement Officer  
Alma Padilla, EPA-SEE Grantee, Inspector  
Scott Pellerin, EPA- Chelmsford Laboratory  
Knatalie Vetter, NH DHHS  
Ross Malcolm, NH DHHS  
Philip Alexakos, City of Manchester Health Department  
Gabriel Porter, US DOL-OSHA (OSHA)  
Marc Pinard, Esq., Brady Sullivan  
Jesse Wright, CEO, Environmental Compliance Specialists, Inc. (hereinafter "ECSI")  
Joldie Battista, Site Supervisor for ECSI

## II. Purpose of Inspection and Background Information

- A. How Firm Was Selected/ Objectives of Inspection: Due to referrals from the NH DHHS and the City of Manchester Health Department, plus several complaints received from residents of Mill West.
- B. Background Information on Firm: Numerous previous inspections of Brady Sullivan by EPA for lead disclosure (1) and RRP (2) compliance; no citations, but one "Close-out Letter" was sent to Marc Pinard, Esq. of Brady Sullivan, dated March 5, 2014, by Alec Aman of EPA as follow-up to the EPA inspection on January 29, 2014 (See Attachment 1).
- C. Account of Pre-Inspection Communications with Firm: Prior inspections of Brady Sullivan only; did not contact Brady Sullivan or its sub-contractor prior to arrival at the site. Sub-contractor is "Environmental Compliance Specialists, Inc." ("ECSI"), Mr. Jesse Wright, CEO/Founder, of POB 1147, Atkinson, NH 03811; address: 111 Route 125, Kingston, NH 03848. City of Manchester and the NH DHHS personnel may have contacted both of them prior to their arrival on May 12, 2015. OSHA inspector also inspected this site for OSHA compliance.

## III. Inspection Time and Paperwork

- A. Start Time: 2:00 pm
- B. End Time: 5:30 pm
- C. EPA Inspector Credential Presented: Yes X to the following company representative(s)  
Name: Marc Pinard; Title: Esquire, for Brady Sullivan acting as General Contractor;  
Name: Jesse Wright; Title: CEO, ECSI, acting as sub-contractor to Brady Sullivan
- D. Forms (Check those signed and if attached. If not signed, add brief explanation as to why.)  
(See Attachments 2 and 3: signed NOI and TSCA CBI forms)

1. Notice of 1018 Inspection Form: N/A\*  
(\*1018 Inspection conducted on 6/03/15: separate Inspection Report)
2. Notice of RRP Inspection Form: signed (Yes X) see attached
3. TSCA Confidentiality Form: signed (Yes X) see attached
4. Receipt for Documents Form: signed (No X); N/A, no records collected during the on-site inspection.

## IV. Business Operations

When was entity established? Brady Sullivan was established in 1992 in Manchester, NH. BS purchased Mill West property in 2007 from its prior owner, Elbes Associates.



What services are provided? Brady Sullivan provides various real estate services: property management (sales, leasing and maintenance for target housing units) and real estate development.

- A. Number of employees: 75+
- B. Number of target housing units at inspection site property: Mill West: 98 units; with ongoing renovation to develop ~ 98 additional target housing units in work site area (1<sup>st</sup> and 2<sup>nd</sup> floors). Property is owned by Brady Sullivan Millworks II, LLC. Different phases of the development of the Mill West and adjoining property, the "Annex" building (~80 target housing units connected by walkway to Mill West), are owned by different single purpose entities as follows:
- Phase 1: renovation and redevelopment into 91 target housing units on 3<sup>rd</sup> and 4<sup>th</sup> floors owned by Brady Sullivan Millworks II, LLC (Timeframe: Sept. 2012 - started building: Sept. 4, 2013 – open for leasing);
  - Phase 2: renovation and redevelopment of the "Annex" with 80 target housing units owned by Brady Sullivan Millworks III, LLC (Timeframe: "Annex" property: Dec. 2013 – started building Dec. 2014 – started leasing); and
  - Phase 3: renovation and redevelopment into 98 target housing units on 1st and 2nd floors owned by Brady Sullivan Millworks IV, LLC (Timeframe: started sandblasting 1st and 2nd floors May 2015 with permit issued to BS for converting portion of property into 110 residential units) (see Attachment 4: Copy of Building Permit).

Number of other Brady Sullivan properties: (see Attachment 5: List of Brady Sullivan's Target Housing properties) and List of Brady Sullivan properties through EPA research, including: property name; location, build date ("b.") and # of target housing units:

NH – 14 complexes (8 TH properties with ~ 500 units):

- 1). Lofts at Mill #1 (300 Bedford St., Manchester) (b. 1889-1891) (110 units);
- 2). Mill West, Manchester - renovated mill building (b. 1889-1891) (presently 110 units; w/ an additional 110 units will be constructed);
- 3). The Annex at Mill West, Manchester (b. ~1889) (110 units);
- 4). Gold St Duplexes, Manchester (b. 1964) (2 bldgs. / 4 units);
- 5). Southside Manor, Manchester (b. 1970) (14 bldgs. / 108 units);
- 6). Stonehenge Litchfield, Litchfield (b. 1970) (3 bldgs. / 17 units);
- 7). Roysan Street Duplexes, Manchester (b. 1963) (7 bldgs. / 14 units); and
- 8). Stonehenge Londonderry, Londonderry (b. 1971-1972) (8 bldgs. / 32-64 units)

MA – 4 complexes (3 TH properties with ~575 units under construction):

- 1). Lancaster Mill, Clinton (b. 1844) - renovated mill building with ~ 132 units, Phase 2 about to start;
- 2). Pacific Mills, Lawrence (b. 1889-90) conversion project from its former commercial use to target housing units that is currently being worked on by Environmental Compliance Specialists, Inc. (ECSI) (Projected # of units: 345); and
- 3). Junction Shops Mill, Worcester, conversion project from its former commercial use to target housing units (b. 1851) (>100 units)

RI – 8 complexes (7 TH properties with ~900 units (some are under construction)):

- 1). American Tourister Mill (b. 1896) under construction: conversion project from commercial into target housing, Warren (~ 190 units);
- 2). American Wire Lofts, Pawtucket (b. 1900) (141 units);
- 3). Grant Mill, Providence: (b. 1890) (85 units);
- 4). Harris Mill Lofts, Coventry (b. 1850) (170 units);
- 5). Lofts at Anthony Mill, Coventry (b. 1868) (113 units);



- 6). Lofts at Pocasset Mill, Johnston (B. 1898) (92 units); and
- 7). Slater Mill, Pawtucket (B. 1882) (142 units)

C. Total # of Target Housing Properties and Units: 18 target housing properties with ~ 1,975 units;

D. Section 8 vouchers at Mill West: none; at other properties: unknown

V. **1018 Rule Inspection:** 1018 Inspection was not done during this inspection on 5/12/15; 1018 Inspection conducted on June 3, 2015 (see separate Inspection Report)

VI. **RRP Rule Inspection**

A. Had entity heard of the RRP Rule? Yes X; How? Mr. Pinard of Brady Sullivan was informed about EPA's RRP Rule and Lead Disclosure Rule during previous EPA inspections: on August 22, 2012 (RRP and 1018), based on complaints regarding issues at another Brady Sullivan property (300 Bedford St., Manchester, NH) and on January 29, 2014 (RRP only), for complaints about the commercial facility, "Extra Space Storage," which was a commercial tenant at the Brady Sullivan property "Mill West." The vacant areas on the 1<sup>st</sup> and 2<sup>nd</sup> floors of the Mill West building were being renovated under a City of Manchester permit issued to Brady Sullivan to rehab into residential units.

B. Did entity have EPA RRP Firm Certification? No X; Brady Sullivan does not have RRP Firm Certification even though it is acting as the General Contractor for the ongoing renovation and redevelopment work.  
ECSI was the sub-contractor hired to sandblast the lead paint from the walls and pillars on the 1<sup>st</sup> floor (north end of building) and also from the "Piano Room" (southeast corner of the building) of the Mill West. ECSI is an RRP certified firm, which was also inspected on 5/12/15 at the Mill West facility. Both BS and ECSI were inspected again as follow-up on 6/03/15- see separate Inspection Reports.

If "Yes", is certificate attached? No X: A copy of the ECSI RRP certificate was not collected during the site visit. ECSI's firm certification was confirmed online: RRP Certified Firm Certificate #: NAT-51986-1, expires June 2, 2015. ECSI has applied for re-certification.

C. Did entity have Certified Renovators on staff? No X

D. Does entity have a system of keeping records of RRP Compliance for subject jobs? (If so, Describe):

Brady Sullivan claimed that the sandblasting work was being done on the "commercial" part of the property and was therefore not considered to be RRP work, but rather an OSHA regulated "Lead in Construction" job. ECSI claimed the same, as well as the fact that BS never informed them that the work site area was being renovated into residential units.

E. Did entity perform jobs subject to RRP Rule?  
Yes X

F. Was inspection a...

1. Work practice inspection? Yes   X  . If "Yes," please complete only the rest of this page and attach at least one of the following.
  - a. Checklist attached? Yes   X
  - b. Field notes attached? No   X   (See notes made on Checklist (above))
  - c. Narrative of work practice inspection attached? Yes   X
2. Records inspection? No   X  ; No records were on-site. A follow-up visit was conducted on June 3, 2015 at ECSI's office in Kingston, NH. EPA inspectors were told by Jesse Wright of ECSI that there were no written contracts for any of the work done by ECSI for BS, not just at the Mill West property, but for other Brady Sullivan properties. Lead dust testing records were collected. Most recently, a report drafted by Les A. Cartier Associates (LCA) states that 88 of 98 Mill West units tested contain lead dust at levels greater than the EPA standards for lead hazards (see Attachment 6, copy of LCA report). This is being addressed with an EPA clean-up order and plan brought under the authority and provisions of EPA's Resource Conservation and Recovery Act (RCRA 7003) (see Attachment 7, copy of EPA Order, dated June 19, 2015). Collection of more information is necessary, but not completed to date.

**VII. Compliance Assistance**

What compliance assistance was provided? A copy of Region 1's Lead Compliance Assistance Outreach Packet with RRP Rule Compliance Assistance information was given to both Mr. Pinard and Mr. Wright during the on-site inspection on May 12, 2015.

**VIII. Records Review:**

- A. How many job records did the inspector review? No records except for a copy of the City Permit issued to BS for renovation work was collected. The permit was issued on April 21, 2015 to Brady Sullivan for construction of 110 residential- "dwelling" units on ground and second floors.
- B. How were jobs selected for review? Only the job involving renovations at Mill West due to several tenant complaints received. The investigation was not expanded to other properties. Marc Pinard stated during the inspection that there was not much in the way of RRP work done to the existing residential units at Mill West, as the construction on the renovated units is new and work, if any was minor.
- C. How many jobs suggested potential non-compliance? At least one at the Mill West location. Since the May 12, 2015 inspection, EPA has learned of other ongoing renovation work at other BS-owned mill/factory buildings being converted into residential units in Massachusetts and Rhode Island. ECSI is also involved with the sandblasting of other BS-owned properties undergoing conversions for use from commercial to residential.



## **IX. Other Agencies Present during EPA's RRP Inspections at the Mill West Work Site**

There are several other government agencies involved with the Mill West work site.

On May 11, 2015, the City of Manchester Building Department stopped the sandblasting work at the Mill West property due to the fact that it was not included in the building permit issued to Brady Sullivan. This action occurred after city officials went to the site and made observations due to receiving complaints from residents of the Mill West property. On the same day, EPA received a referral from the states about the site and a complaint about the ongoing work at Mill West. The next day, on May 12, 2015, EPA inspectors Magoon, Padilla and Pellerin met at the Mill West site. Other agencies' representatives were also present:

- Phillip Alexakos of the City of Manchester, NH;
- Knatalie Vetter and Ross Malcolm, of the New Hampshire Department of Health and Human Services (NH DHHS, Concord, NH office; and
- Gabriel Porter, U.S. Department of Labor- Occupation Safety and Health Administration, Concord, NH office.

### **List of Attachments**

1. Copy of "Close-out Letter" was sent to Marc Pinard, Esq. of BS, dated March 5, 2014, by Alec Aman of EPA as follow to the EPA inspection on January 29, 2014;
2. Copy of signed NOI form, dated May 12, 2015;
3. Copy of signed TSCA CBI form, dated May 12, 2015;
4. Copy of City of Manchester Building Permit issued to Brady Sullivan, dated April 21, 2015;
5. List of Brady Sullivan Properties, dated 11/16/15;
6. Copy of Les A. Cartier and Associates report: "Plan for Lead Dust Wipe Analysis / Lead Dust Hazard Mitigation" prepared by American Environmental Testing Services of New England, LLC (AETS): 195 McGregor St, Manchester NH (see Plan 2 of 3, Section 5.1, Page 5), dated August 11, 2015; and
7. Copy of EPA's Resource Conservation and Recovery Act (RCRA 7003) Emergency Order issued to Brady Sullivan, dated June 19, 2015.



## **Simpson, Andrea**

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**From:** Magoon, Molly  
**Sent:** Thursday, December 17, 2015 9:39 AM  
**To:** Chow, James; Simpson, Andrea; McGuire, Karen; Wagner, Michael  
**Cc:** Pellerin, Scott; Bosch, Ermina; Browne, Mike; Bryson, James M.; Carr, Robert; Hayes, Sharon; Levin, Ronnie; Magoon, Molly; Padilla, Alma; Smith, Catherine  
**Subject:** Union Leader Press about Mill West/ Petition and Issues

FYI: Press about Brady Sullivan petition and issues in the Union Leader newspaper in Manchester, NH:

<http://www.unionleader.com/Thousands-sign-petition-asking-EPA-to-investigate-lead-in-Mill-West>

# **EPA Photo Log**

**Facility: Brady Sullivan/ Lofts at Mill West, Manchester, NH; Photos taken my EPA Inspector Magoon**

<b>Photo No.</b>	<b>Camera File No.</b>	<b>Date and Time taken</b>	<b>Description of Photo</b>
1	IMG_0280.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: chipping paint (white) on wood panelling in Common Area
2	IMG_0281.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Green Painted floor with paint chip/debris (white) (w/beige trim on door and baseboard)
3	IMG_0282.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Exterior of Worksite area; garage door (closed):
4	IMG_0283.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Close-up of black sand blasting debris and white paint debris at Bldg. entrance (same entrance as Photo #4 above)
5	IMG_0284.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg.: Exterior metal staircase leading to green painted door near entrance loading dock and worksite area
6	IMG_0285.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Interior, green painted door, brick staircase wall and pipe; black sandblasting debris on metal flooring, as well as white dust on floor, bricks, stairs and staircase siding; taken in hallway outside worksite in loading dock area
7	IMG_0286.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Green painted interior brick wall: Blurry
8	IMG_0287.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Blurry
9	IMG_0288.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: blurry
10	IMG_0289.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Interior hallway floor (green painted) with white brick painted walls with dust on floor and mouldings (wall and red painted portion of pipe)
11	IMG_0290.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Blurry
12	IMG_0291.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Rusty dust on green painted sairs and staircase siding (w/unpainted wooden handrail)



# EPA Photo Log

Facility: Brady Sullivan/ Lofts at Mill West, Manchester, NH; Photos taken by EPA Inspector Magoon

13	IMG_0292.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: White painted brick wall with uneven, chipping paint; and dust and paint chips on green painted floor and wall moulding
14	IMG_0293.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Paint chips and debris on 3rd story window in common area staircase (same staircase as other common hallway/staircase photos listed above)
15	IMG_0294.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Corner of hallway: White painted brick wall with uneven, chipping paint; and dust and paint chips on green painted floor and wall moulding
16	IMG_0295.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Interior dusty bannister, 1st floor
	IMG_0296.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Black sandblasting debris mixed with white paint dust and debris on floor outside green door (Interior 1st floor/outside worksite area) (green painted metal flooring)
	IMG_0297.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: Dusty Green painted, interior door and white painted brick walls and pipe fixtures (near worksite area)
	IMG_0298.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway: new piping fixture with dusty brass parts and dusty, red painted handle and fixture part
	IMG_0299.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Hallway/staircase outside worksite area: paint and dust debris on metal floor with pipe with dusty red attachment
	IMG_0300.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common entrance doors (from exterior): some intact green paint and peeling green paint on exterior of green painted entrance door.
	IMG_0301.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg. Common Entrance door: close-up of same door as one in Photo #23
	IMG_0302.jpg	12-May-15	195 McGregor Street, Manchester, NH: Mill West Bldg.